

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: **INSERT DATE**

Region: Fayetteville Regional Office
County: Montgomery
NC Facility ID: 6200061
Inspector's Name: Gregory Reeves
Date of Last Inspection: 04/11/2017
Compliance Code: 5 / In Physical Compliance

<p align="center">Facility Data</p> <p>Applicant (Facility's Name): Unilin Flooring, N.V.</p> <p>Facility Address: Unilin Flooring, N.V. 149 Homanit USA Road Mount Gilead, NC 27306</p> <p>SIC: 2493 / Reconstituted Wood Products NAICS: 321219 / Reconstituted Wood Product Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p align="center">Permit Applicability (this application only)</p> <p>SIP: N/A NSPS: N/A NESHAP: 40 CFR Part 63 Subpart QQQQ PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A</p>																																																				
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<p>Review Engineer: Charles F. Yirka</p> <p>Review Engineer's Signature: _____ Date: INSERT DATE</p>				<p align="center">Comments / Recommendations:</p> <p>Issue 08803/T21 Permit Issue Date: INSERT DATE Permit Expiration Date: April 30, 2020</p>																																																			

1. Purpose of Application

Unilin Manufacturing N.V., Mt. Gilead facility, (Unilin) currently holds Title V Permit No. 08803T20 with an expiration date of April 30, 2020 for a thin-high density fiberboard (THDF) plant in Mt. Gilead, Montgomery County, North Carolina. This permit application is for a significant modification. The application was received on March 24, 2017.

The purpose of the application is to add one NESHAP regulation to the permit; 40 CFR 63, Subpart QQQQ (Surface Coating of Wood Building Products). The facility's Rotographic surface coating line (**ID No. ES-50**) is subject to this regulation. There are no emissions increases associated with this permit application. A summary of the requested changes is included below. See Section 6 below.

2. Facility Description

Unilin owns and operates a thin-high density fiberboard (THDF) plant (SIC (2493)) that is located in Mt. Gilead, Montgomery County, NC.

3. Application Chronology

Application Chronology

March 24, 2017	Received application for a significant modification of the permit. An acknowledgment letter indicating that the application for permit was deemed complete on the same day it was mailed.
April 11, 2016	The facility was last inspected by Mr. Gregory Reeves of the Fayetteville Regional Office (FRO). The facility was considered to be in physical compliance and that company had determined the Rotographic coating line (ES-50) was subject to the NESHAP Subparts JJ and QQQQ.
April 21, 2017	Sent a completeness additional information via email to verify the date of construction so the claim that the source ES-50 was an existing source for the purposes of Subpart QQQQ.
April 28, 2017	Response to the completeness additional information via email was received verifying the source ES-50 was an existing source for the purposes of Subpart QQQQ.
May 9, 2017	Sent draft permit and permit review for review to Mr. Jeff Twisdale, Acting Title V Supervisor.
May 11, 2017	Mr. Reeves of the FRO provided comments on the permit application.
May 16, 2017	Industrial accident (explosion and fire) occurred at the facility destroying control device.
May 19, 2017	Received comments from Mr. Twisdale.

May 24, 2017	Sent draft permit and permit review for review to Mr. Reeves, Mr. Samir Parekh of the Stationary Compliance Branch (SSCB), Mr. Dale Overcash with Trinity Consultants.
June 4, 2017	Received comments from Mr. Reeves of the FRO.
June 7, 2017	Request from Mr. Overcash to place the processing of the application on hold due to accident. DAQ concurred with request.
June 30, 2017	Meeting was held to discuss applicability of 40 CFR 63 Subpart JJ to the coating operation (ID No. ES-50) as proposed in the application and draft permit and review.
August 4, 2017	Date of letter received from Mr. Charlie Carter of Burns, Day and Presnell, P.A. attorneys at law to DAQ Chiefs Willets and Van der Vaart. The letter was in follow-up to the meeting. Letter states Subpart JJ would not apply to (ES-50) only QQQQ would apply and referenced revisions to the subpart. DAQ concurred with this finding
August 9, 2017	Sent revised draft permit and permit review for review to Mr. Reeves, Mr. Samir Parekh of the Stationary Compliance Branch (SSCB), Mr. Dale Overcash with Trinity Consultants and Mr. Mark Cuilla, Title V Supervisor.
August 15, 2017	Received comments from Mr. Reeves of the FRO.
August 17, 2017	Received letter from Unilin regarding notification of change of Title V Responsible Official. Received comments from Mr. Overcash. Revised draft permit and review and IBEAM.
August 17, 2016	Received comments from Mr. Overcash. Revised draft permit and review.
August 18, 2017	Sent revised draft permit and review to Mr. Cuilla for review and comment
August 21, 2017	Received comments from Mr. Cuilla.
INSERT DATE	Draft permit sent to concurrent public notice and EPA review.
INSERT DATE	Public comment period ends. No public comments were received.
INSERT DATE	EPA comment period ends. No comments from EPA were received.
INSERT DATE	Permit issued.

4. Permit Modifications/Changes and TVEE Discussion

The following table describes the modifications to the current permit as part of this modification process.

Pages	Section	Description of Changes
Cover and throughout	-- -- --	<ul style="list-style-type: none">• Updated format, responsible official and all dates and permit revision numbers.• Removed paragraph in cover letter concerning the recent minor modification as permit is now final.• Inserted increment statement in cover letter.
5	1 – Equipment List	<ul style="list-style-type: none">• Inserted MACT QQQQ designation in the Emissions Source ID No. column for ES-50 the rotographic coating line.• Removed footnote to equipment list concerning the recent minor modification as permit is now final.
16	2.1 D. Table	<ul style="list-style-type: none">• Removed reference to permit condition for 02D .0958 as this regulation no longer applies.
21-25	2.1 G. 2.1 G. Table 2.1 G.3 a.-aa.	<ul style="list-style-type: none">• Changed description of existing source ES-50 adding “coating wood panels and doorskins”.• Removed 02D .0958 as this regulation no longer applies and added the MACT Subpart QQQQ.• Inserted new permit condition for 02D .1111 and the MACT Subpart QQQQ.
30	2.2 A. Table 2.2A. 1.a.-d.	<ul style="list-style-type: none">• Removed Table that only referred to 02D .0958.• Removed permit condition for 02D .0958 as this regulation no longer applies.
39	2.3 B.	<ul style="list-style-type: none">• Added permit shield stipulation for MACT Subpart JJ applicability.
40-48	3	<ul style="list-style-type: none">• Replaced General Conditions (version 5.1, 08/03/2017)

The following changes were made to the Title V Equipment Editor (TVEE) under this permit modification:

- Changed emission source description for source (**ID No. ES-50**).
- Added MACT designations (Subpart QQQQ) in TVEE to source (**ID No. ES-50**). Changed to MACT designation to Subpart QQQQ only, not JJJJ, in TVEE were approved by Ms. Jenny Shepard on **June 7, 2017** and the revised **INSERT DATE**.

5. Change in Emissions

There are no changes in emissions because of the changes requested as part of this modification.

Air Toxics Evaluation

Under a previous permit modification, a facility-wide evaluation was conducted to ensure that no unacceptable risk to human health resulted from the removal of the 02D .1100 permit conditions.

There are no changes in emissions as a result of the changes requested under this modification.

6. Regulatory Review

Unilin is subject to the following regulations. The permit was updated to reflect the most current stipulations for all applicable regulations:

- 15A NCAC 02D .0501, Compliance with Emission Control Standards
- 15A NCAC 02D .0504, Particulates from Wood Burning Indirect Heat Exchangers
- 15A NCAC 02D .0512, Particulates from Miscellaneous Wood Products Finishing Plants
- 15A NCAC 02D .0521, Control of Visible Emissions
- 15A NCAC 02D .0614, Compliance Assurance Monitoring
- 15A NCAC 02D .0958, Work Practices for Sources of Volatile Organic Compounds*
- 15A NCAC 02D .0530, Prevention of Significant Deterioration
- 15A NCAC 02D .1111, National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (40 CFR 63, Subpart DDDD); National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ)

*No longer subject.

A regulatory review for these existing requirements to existing non-affected sources will not be included in this document.

The following additional regulation apply to the existing source **(ID No. ES-50)**:

- 15A NCAC 02D .1111, Maximum Achievable Control Technology - National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products (40 CFR 63, Subpart QQQQ)

The following emission source description was revised as indicated by highlighting:

One rotographic surface coating line (ID No. ES-50) coating wood panels and doorskins

7. Regulatory Analysis

- 15A NCAC 02D .1111, Maximum Achievable Control Technology - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products (40 CFR 63, Subpart QQQQ)

The rotographic surface coating line **(ID No. ES-50)** is an affected source subject to the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products (40 CFR 63 Subpart QQQQ).

Applicability

The rotographic surface coating line performs surface coating of doorskins, which meets the source category description for doors, windows, and miscellaneous under §63.4681(a)(1). This surface coating line uses 1,100 gallons or more of coatings per year and is located at a major source of HAPs per §63.4681(b). The coating line construction commenced on or before June 21, 2002 [63.4682(c)]. The compliance date is 3 years after **May 28, 2003**¹ [63.4683(b)]. As such the coating line is an existing affected source.

Emission Standards and Work Practices

Unilin is complying with the emission standards by selecting the option to meet the emission limits for existing sources without add-on controls per §63.4691(b) and Table 2. Unilin will demonstrate compliance with the emission rates by calculating a rolling 12-month emission rate on a monthly basis. As required by this option, Unilin will follow §63.4751 and determine the mass fraction of organic HAP, volume fraction of coating solids for each coating, density and volume of each material, the mass of organic HAP emissions, the total volume of coating solids used, and the organic HAP emission rate.

Because Unilin is using the emission rate without add-on controls option, the facility is not required to meet any operating limits nor work practice standards, in accordance with §63.4692(a) and §63.4693(a), respectively.

Notifications and Reporting

Unilin must submit the initial notification and notice of compliance status (NOCS) per §63.4710. This application is considered the initial notification. Because the facility recently became aware of the Subpart QQQQ monitoring, recordkeeping and reporting requirements, coating usage data is being tracked beginning on **January 1, 2017**. A NOCS will be submitted no later than **January 30, 2018**.

Unilin must submit semiannual compliance reports for source (**ID No. ES-50**), due no later than July 31 or January 31, per §63.4720. Because Unilin has a Title V operating permit, it is requested that the monitoring, recordkeeping and reporting requirements be added to the permit. The facility must report all deviations in the semiannual monitoring report required by the permit. If there are no deviations from the emission limitations, the semiannual compliance report must include a statement that there were no deviations during the reporting period. For deviations using the emission rate without add-on controls option, Unilin must report information related to the deviations as required by §63.4720(a)(7).

¹ See April 28, 2017 email from Mr. Overcash, Trinity Consultants with email and attached document from Ric Aikman the RO. Mr. Aikman indicated construction commenced sometime in 2001. The attached document indicated that the line began operations in April 2002. As such, the email and the attached document verify that the coating line is an existing source under MACT QQQQ.

Recordkeeping

Unilin must keep records of all notifications and reports per §63.4730. The facility must retain current information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the HAP content for each coating.

For each compliance period, Unilin must keep a record of the coating operations at which each compliance option was used and the time periods, the calculation of the total mass or organic HAP emissions used each month, the calculation of total volume of coating solids used each month, and the calculation of each 12-month organic HAP emission rate.

Unilin must also record the name and volume of each coating, thinner, and cleaning material, mass fraction of organic HAP, volume fraction of coating solids, and density for each material.

For deviations, Unilin must record the date, time, and duration of each deviation.

Compliance is expected.

8. NSPS, NESHAPS/MACT, NSR/PSD/INCREMENT, RACT, 112(r), CAM

NSPS

The facility is not subject to any New Source Performance Standards. This permit modification does not affect this status.

NESHAPS/MACT

The facility is major for HAPs and is subject to several MACTs. This permit application requested the addition and insertion of the MACTs Subparts JJ and QQQQ. It was determined later that the MACT Subpart JJ would not apply because the facility manufactures high density fiberboard and does not manufacture furniture or furniture components as defined in Subpart JJ. The applicability of Subpart QQQQ is discussed in Section 7 above.

NSR/PSD/INCREMENT

Unilin is subject to PSD. This permit application did not affect this status. Unilin is in Montgomery County. This area is considered in attainment. Montgomery County has triggered increment tracking under PSD for PM10 and NOx. However, this permit modification/renewal does not consume or expand increments for any pollutants.

RACT

Unilin is in Montgomery County. The area has not ever been in nonattainment, therefore, RACT does not apply.

112(r)

The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in 112(r).

CAM

This facility is subject to 40 CFR Part 64 the CAM rule. This permit modification does not effect this status.

9. Facility Wide Air Toxics

The proposed modification does not include new sources and will not result in a potential emission increase of any state air toxic pollutants. Under a previous permit modification, a facility-wide evaluation was conducted to ensure that no unacceptable risk to human health resulted from the removal of the 02D .1100 permit conditions. This modification permit does not effect this status.

10. Facility Emissions Review

There appears to be no potential emissions increases under this modification. Actual emissions for criteria pollutants and HAPs are provided in the header of this permit review.

11. Compliance Status

During the most recent inspection, conducted on **April 11, 2016**, by Mr. Reeves of the FRO, the facility appeared to be in physical compliance with all applicable requirements. The inspection report indicates the facility recognized that the MACTs JJ and QQQQ may apply. RCO has evaluated information submitted by the company regarding applicability of MACT JJ. (See August 4, 2017 letter). RCO determined that MACT JJ does not apply. Additionally, a signed Title V Compliance Certification (Form E5) indicating that the facility was not in compliance with all applicable requirements was included with this application for a significant permit modification.

12. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. The State of South Carolina and the Mecklenburg County Local Program are affected state/local programs within 50 miles of the facility.

13. Other Regulatory Considerations

- A P.E. seal is NOT required for this application.
- A zoning consistency determination is NOT required for this application.

13. Recommendations

The application for a significant modification for Unilin Flooring N.V in Mt. Gilead, Montgomery County, NC has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 08803T21.